

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Malcolm Mackey

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(Pro Hac Vice Motion Pending)

*Attorneys for Plaintiff, JANE DOE*

## SUPERIOR COURT OF THE STATE OF CALIFORNIA

### COUNTY OF LOS ANGELES

JANE DOE, an individual;

Plaintiff,

vs.

AGENCY FOR THE PERFORMING ARTS,  
INC., a Delaware Corporation, dba APA  
AGENCY; JIM GOSNELL, an individual;  
PAUL SANTANA, an individual; JOSH  
HUMISTON, an individual; MICHAEL  
HAMMOND, an individual; and DOES 1  
through 50, inclusive,

Defendants.

CASE NO. 19STCV21336

### VERIFIED COMPLAINT FOR DAMAGES

1. SEXUAL HARRASMENT;
2. GENDER VIOLENCE;
3. CIVIL HARRASMENT;
4. INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS;
5. NEGLIGENT INFLICTION OF  
EMOTIONAL DISTRESS;
6. NEGLIGENT RETENTION AND  
SUPERVISION;
7. RETALIATION;
8. WRONGFUL TERMINATION;
9. SEXUAL BATTERY.

### DEMAND FOR JURY TRIAL

GERAGOS & GERAGOS, APC  
HISTORIC ENGINE CO. NO. 28  
644 South Figueroa Street  
Los Angeles, California 90017-3411

1 Plaintiff JANE DOE<sup>1</sup> ("Plaintiff") alleges as follows on personal knowledge as to  
2 herself and her own acts, and on information and belief as to all other matters:

3 INTRODUCTION

4 1. As set out in detail below, Plaintiff's dream of becoming a well-respected  
5 Talent Agent was quickly and cruelly dashed before it could even truly begin by a toxic,  
6 pervasive, and sexually abusive environment fomented by the senior management at one of  
7 the nation's leading talent agencies, Defendant Agency for the Performing Arts, Inc., known  
8 as the APA Agency ("APA").

9 2. Instead of working her way up from the "mail room" (or in her case, from a  
10 senior Executive Assistant to the President/ CEO Jim Gosnell ("Gosnell")) to Talent Agent as  
11 her male counterparts were permitted to do since time immemorial, Plaintiff was incessantly  
12 subjected to sexual advances, crude and obscene comments, and retaliation, not at the hands  
13 of underlings at APA, but by its most senior apex management.

14 3. APA's culture promoted sexual harassment, discrimination, retaliation and  
15 sexual violence against its female employees. The men in power at APA were allowed to prey  
16 upon usually much younger female subordinates, aided and abetted by APA's Director of  
17 Human Resources and General Counsel, both females.

18 4. This was the result of the "tone" being set from the top of the  
19 organization—Gosnell was a serial abuser himself, hurling invective (and trash cans and  
20 staplers when words failed him) at Plaintiff while she was his Executive Assistant. That, and  
21 he undermined the agency's HR function by having an affair with its Director while Plaintiff  
22 was employed.

23 5. These powerful men felt so protected by APA and its senior management and  
24 HR and law departments, that they even brazenly put their actions into words, by texting  
25 Plaintiff vulgar and inappropriate comments with apparent impunity.

26  
27 <sup>1</sup> Because of the nature of the allegations herein, Plaintiff is identified by a pseudonym in  
28 order to preserve her confidentiality and to avoid any potential opprobrium, pursuant to  
applicable law, including *Starbucks Corp. v. Superior Court* (2008) 168 Cal.App.4<sup>th</sup> 1436.

6. In behavior that shocks the conscience, Plaintiff was frequently subjected to crude sexual comments and overtures by the very apex of APA's male management. For example, (and with apologies to the Court for having to reproduce word-for-word here the obscene abuse Plaintiff was subjected to), Defendant Humiston, APA's Head of Music, texted Plaintiff comments such as the following:

a. "If you fuck me, I'll convince [the] [CEO] to pay you more money."

b. "Your body is so hot, I've never seen it in a bikini. [Y]ou should come over to my pool."

And when Humiston wanted to retaliate against Plaintiff for rebuffing his unwanted advances, he turned even more disgusting and cruel:

c. "You're a fucking cunt [.] [Y]ou must suck black cocks...to sign clients" and,

d. "I'm going to get you fired bitch [.] I know you suck pussy and cock..."

7. Humiston's conduct would be enough to subject APA to liability. Unfortunately, he was just one of several powerful members of APA's management team that ran amok and abused Plaintiff. Defendant Santana, the Vice President of APA's Talent Department, also incessantly texted and verbally made sexually graphic remarks to Plaintiff, over her frequent objections, such as:

a. "...you make me so horny. Right across from me all day [;] all the thoughts are running through my head."

b. "If I take you on a weekend getaway [.] I could finally live out these fantasies I have for you."

c. "...come on [.] Your ass looks so hot in those jeans[s]."

d. "Do you know how hard I am right now? All for you."

8. APA's predatory culture presented women such as Plaintiff in the pre-#metoo world with a cruel choice (which was in fact no choice at all)—suffer the abuse at the hands of those who could make or break careers, or complain and suffer retaliation and termination.

9. And to add "injury to insult", this was all done under the watchful eye of an HR department whose director was unable and unwilling to do her job and protect Plaintiff

1 because she herself was in an inappropriate sexual relationship with APA's President/CEO,  
2 and a female general counsel who cared more about protecting a key client relationship than  
3 protecting Plaintiff and enforcing the law. This explains precisely why Plaintiff's frequent  
4 reporting of the abuse she suffered fell on deaf ears, and ultimately led to her being retaliated  
5 against and fired.

6 10. Having endured more than most humans could during her short tenure at APA,  
7 while still managing to succeed in this male-dominated agency, Plaintiff's personal horror  
8 show culminated in her being sexually assaulted by an "important" APA client—Defendant  
9 Michael Hammond ("Hammond"), the Chief Operating Officer of Collins Avenue  
10 Productions. When she dutifully reported the assault to APA, she was threatened by the  
11 company's senior management and APA's Office of the General Counsel, to not report it to  
12 law enforcement or she would be terminated.

13 11. It should come as no surprise that APA ultimately retaliated against Plaintiff,  
14 firing her on some trumped up, pretextual allegations having no basis in fact. This only  
15 months after APA conducted a fake "investigation" of her allegations. And then in the  
16 ultimate act of intimidation and "chutzpah," and to try to silence her, filed an arbitration  
17 claim against Plaintiff claiming that her reporting of APA's abusive conduct constituted  
18 harassment of the agency!

### 19 PARTIES

20 12. Plaintiff Jane Doe, at all relevant times, was an individual residing in Los  
21 Angeles County, California.

22 13. Defendant APA at all relevant times was a Delaware corporation registered to  
23 do business in the State of California. Founded in 1962, APA is one of the largest diversified  
24 talent agencies in Los Angeles, California, with headquarters in Beverly Hills, New York,  
25 Nashville and London. APA represents actors, writers, producers, showrunners, directors,  
26 performers, physical production services, film studios, and luxury and lifestyle brands across  
27 all media platforms worldwide, including well known past and current talent such as Aziz  
28 Ansari, Kevin Hart, Gary Oldman and Amy Schumer. At all times alleged herein, APA



1 directly employed Plaintiff, as defined in the Fair Employment and Housing Act ("FEHA")  
2 at Government Code §12926(d). Further, APA compelled, coerced, aided, and abetted the  
3 discrimination and harassment, which is prohibited under Government Code §12940(i).

4 14. Defendant Jim Gosnell ("Gosnell"), at all relevant times, was an individual  
5 residing in Los Angeles County, California and employed by APA at its headquarters in  
6 Beverly Hills. Gosnell is APA's President and Chief Executive Officer.

7 15. Defendant Paul Santana ("Santana"), at all relevant times, was an individual  
8 residing in Los Angeles County, California and employed by APA at its headquarters in  
9 Beverly Hills. Santana is Vice President of APA's Talent Department.

10 16. Defendant Josh Humiston ("Humiston"), at all relevant times, was an  
11 individual residing in Los Angeles, California and employed by APA at its headquarters in  
12 Beverly Hills. Humiston is a Partner at APA and the Head of APA's Music Department.

13 17. Defendant Michael Hammond ("Hammond"), at all times was an individual  
14 residing in Los Angeles County, California and the Chief Operating Officer of Collins  
15 Avenue Productions ("Collins"), which is one of APA's premier clients. Collins Avenue  
16 Productions is an American television production company headquartered in Los Angeles,  
17 California and owned by its Founder and CEO, Jeff Collins. At all relevant times herein  
18 alleged, Defendant APA encouraged, permitted and condoned Mr. Hammond's conduct.  
19 Hammond reports directly to Collins.

20 18. Defendants DOES 1 to 50, inclusive are sued under fictitious names pursuant  
21 to Code of Civil Procedure § 474. Plaintiff is informed and believes, and on that basis  
22 alleges, that each of the defendants sued under fictitious names is in some manner  
23 responsible for the wrongs and damages alleged below, and in so acting, was functioning as  
24 the agent, servant, partner, and employee of the co-defendants, and in taking the actions  
25 mentioned below, was acting within the course and scope of his or her authority as such  
26 agent, servant, partner, and employee with the permission and consent of the co-defendants.  
27 The named defendants and Doe defendants are sometimes hereafter referred to, collectively  
28 and/or individually, as "defendants."

22. Plaintiff is informed and believes and, based on such information and belief, alleges that this Court is the proper venue for trial because any and all causes of action accrued here, the named Defendants conduct business here and witnesses are located here.

23. Plaintiff is informed and believes and, based on such information and belief, alleges that the intentional acts occurred here and that the remedies sought are within the Court's jurisdiction as damages exceed the minimum amount for an unlimited case.

24. Plaintiff has timely filed a Notice of Complaint with the California Department of Fair Employment and Housing, and has received a Right to Sue Letter prior to the commencement and filing of this action.

#### GENERAL ALLEGATIONS

25. Plaintiff's deep family connections to the entertainment industry provided her, even at the beginning of her career, with unique access to top talent within the industry. Accordingly, Plaintiff committed herself to joining the entertainment industry by pursuing her dream job of becoming a Talent Agent. In May 2015, Plaintiff got her opportunity and was hired on as the Executive Assistant for Gosnell—the President and CEO of APA.

26. It was immediately apparent to everyone at APA that Plaintiff had a very promising future in the entertainment industry and would make an exemplary Talent Agent. At all times, Plaintiff went above and beyond the scope of her obligations and impressed her colleagues and clients alike with her attitude and work ethic.

27. Indeed, on numerous occasions, Gosnell praised Plaintiff's work ethic commending her as a "superstar" and noting that she had the likeability and temperament to succeed as a Talent Agent. Unsurprisingly then, Plaintiff regularly received exemplary oral "performance reviews", high verbal praise and bonuses throughout her career at APA. However, despite the accolades, Plaintiff quickly became the target of repeated unwanted and offensive, sexual harassment, which was overtly committed and condoned by APA.

28. Throughout Plaintiff's employment at APA, that is, from May 2015 to August 2018, several of APA's executives and members of its management team, routinely subjected Plaintiff to despicable sexual conduct. Moreover, APA's senior executives and members of its management team directly targeted and sexually propositioned Plaintiff on numerous occasions. These senior managers and partners later retaliated against Plaintiff

1 because she would not engage in sexual acts, ultimately culminating in Plaintiff's  
2 termination at APA in August 2018.

3 **Humiston's Unrelenting Campaign of Sexual Degradation Against Plaintiff**  
4 **Begins Almost Immediately After She is Hired by APA**

5 29. In early May 2015, Plaintiff became the target of Humiston's sexual advances.  
6 One particular brazen attempt at sexual contact occurred within a matter of weeks after  
7 Plaintiff was hired at APA whereby Humiston—the Head of Music at APA—told Plaintiff:  
8 "I know your breasts are not real", and then proceeded to reach out to squeeze Plaintiff's  
9 breasts. Plaintiff moved out of the way in just enough time to avoid Humiston's grasp.

10 30. Thereafter, and on a weekly, and sometimes even a daily basis, Humiston  
11 unabashedly asked and even demanded that Plaintiff have sexual intercourse with him. In  
12 addition, Humiston would repeatedly make offensive and disparaging remarks to Plaintiff  
13 such as: "I didn't marry a Jewish bitch like you because they don't take it up the ass", and "If  
14 you don't fuck me, you'll never make agent", and "If I don't like you, you're gone and I'm  
15 getting you fired", and "I think you should blow me".

16 31. Additionally, Humiston would text Plaintiff deeply disturbing and incredibly  
17 offensive comments, including the following messages in quotes below:

- 18 a. "If you fuck me I'll convince [CEO] Jim [Gosnell] to pay you more money"  
19 b. "Your body is so hot I've never seen it in a bikini you should come over to my  
20 pool"  
21 c. "You're a fucking cunt[.] [Y]ou must suck black cocks like [a woman who  
22 worked at a different Talent Agency] to sign clients"  
23 d. "I'm going to get you fired bitch. I know you suck pussy and cock like [a  
24 former colleague of Plaintiff's]."

25 True and correct copies of these referenced and partially redacted text messages from  
26 Humiston to Plaintiff are attached hereto as "**Exhibit 1**".

27  
28 <sup>2</sup> The undersigned regrets having to reproduce in the pleading the vulgar language APA  
subjected Plaintiff to, and apologizes in advance to this Honorable Court for its necessity.

1           32. The fact that Humiston (and others at APA) felt brazen enough to put their bad  
2 behavior in writing is reflective of how toxic, tolerant and protective APA's culture of sexual  
3 and racial discrimination is.

4           33. Humiston's sexually harassing and wildly inappropriate behavior toward  
5 Plaintiff continued throughout Plaintiff's employment at APA, including numerous instances  
6 in which he made extremely offensive racial and sexual remarks, such as those listed in  
7 Paragraph 31(a)-(d) above, and other comments like, "I won't let you in the Music  
8 Department unless you fuck me", and "You'll never be a Talent Agent unless you fuck me,  
9 I'm going to make sure of it", and "If you fuck me, maybe I'll make you a Talent Agent—I  
10 control Jim Gosnell—so I decide", and "Your body is so hot, you should come over to my  
11 pool" and, "show me your boobs, I know they aren't real".

12           34. Plaintiff repeatedly reported Humiston's unwanted sexual harassment and  
13 boorish remarks to Gosnell and APA's Head of Human Resources—Joanne Johnson ("J.  
14 Johnson")—but neither ever disciplined Humiston. Rather, Gosnell and J. Johnson condoned  
15 the conduct by dismissing Plaintiff's complaints and telling her that "that's just the way life  
16 is working in talent agencies" and that she "better get used to it."

17           35. In addition, and after nearly a year of working at APA, Plaintiff learned from J.  
18 Johnson that she and Gosnell maintained a sexual relationship spanning about fifteen years.

19           36. Unfortunately, Humiston's behavior was neither rogue nor isolated, but  
20 reflective of APA's toxic culture as embodied further by Gosnell.

21           **Gosnell Also Viciously Harassed and Physically Assaulted Plaintiff**

22           37. In working as Gosnell's Executive Assistant for nearly two years, Plaintiff was  
23 forced to endure Gosnell's mood swings, which would frequently manifest themselves into  
24 violent, physical bursts of anger, including, on multiple occasions, with Gosnell referring to  
25 Plaintiff as a "bitch" and a "fucking cunt." For example, in August 2016, Gosnell threw a  
26 glass of water at Plaintiff after berating her; in January 2017, Gosnell threw a trash can filled  
27 with trash and a glass at Plaintiff and called her a "cunt", and later that year, in December  
28 2017, Gosnell threw a stapler at Plaintiff's head and again berated her for two hours; and in



1 January 2018, Gosnell threw a trashcan again at Plaintiff and called her a “bitch” and an “icy  
2 cold cunt.” Plaintiff reported this behavior to J. Johnson—the Head of HR at APA, but every  
3 time, Plaintiff’s complaints were met with excuses, indifference or opaque warnings that if  
4 she continued to complain about such behavior, she would not advance at APA.

5 38. When Gosnell begrudgingly promoted Plaintiff on or about April 2017 to the  
6 position of Talent Agent<sup>3</sup> at APA, he still found cruel ways to harass and retaliate against  
7 her, including, relocating her workspace (formerly outside of Gosnell’s office) to her new  
8 “office” in the office real estate equivalent of Siberia—the kitchen<sup>4</sup>. This, of course, was  
9 done not only to demean Plaintiff, but to put her in a subordinate position so that she would  
10 be further susceptible to advances by the powerful men at APA, who would then offer to  
11 “rescue” her from the kitchen if she succumbed to their inappropriate sexual overtures.

12 39. For example, in May 2017, Humiston repeatedly told Plaintiff “everyone  
13 needs to fuck me to advance” and “to go back to the kitchen where women belong” and “if  
14 you fuck me, maybe you’ll get an office”. Additionally, other executives and male  
15 colleagues at APA would belittle Plaintiff by: frequently interrupting and chatting with  
16 Plaintiff in her kitchen “office” while she tried to work; calling her “Cinderella” and asking  
17 why she did not have her own office like all the other Talent Agents; and leaving dirty dishes  
18 and partially eaten food on her desk.

19 **Jim Osborne—APA’s Head of Talent—Is A Virulent Anti-Semite Who**  
20 **Occasionally Subjected Plaintiff to His Rants**

21 40. In addition to the rampant sexual harassment that Plaintiff endured during her  
22 employment at APA, Plaintiff, who is Jewish, was subjected to various racially and  
23 religiously hostile remarks from various executives at APA, including Jim Osborne  
24 (“Osborne”)—a Partner at APA and the co-head of the Talent Department.

25 \_\_\_\_\_  
26 <sup>3</sup> Gosnell initially promoted Plaintiff to Talent Agent in late 2016, but then reneged on that  
27 promotion in January 2017 as part of his retaliation against Plaintiff. Thereafter, Plaintiff was  
28 not promoted to Talent Agent until after she signed a music artist to APA in April 2017.

<sup>4</sup> This was done despite the fact that there were plenty of other offices available at APA  
suitable for a Talent Agent such as Plaintiff.



1           41. On several occasions, Osborne would make remarks toward Plaintiff such as:  
2           “You’re OK because you don’t look like a Jew”, and “the Holocaust never happened”, and  
3           “Hitler was a fabrication of the Jews”, and “Jews are the reason the world is so fucked up”.

4           42. On another occasion in November 2017, Gosnell even told Plaintiff to “take  
5           off [your] Star of David necklace because “it doesn’t work for [you]”. Thereafter, Gosnell  
6           proceeded to tell Plaintiff that one of his partners—Lee Dinstman (who is Jewish)—“is such  
7           a penny pinching Jew that he’s going to take it to the grave” and that “Lee’s Jew-y cheapness  
8           drives me nuts.”

9           43. Plaintiff complained about the offensive Jewish remarks to J. Johnson—the  
10          Head of Human Resources—and another colleague of hers, but to Plaintiff’s knowledge,  
11          nothing was ever done to reprimand and/or otherwise address the misconduct. Rather,  
12          Plaintiff would simply receive excuses from J. Johnson for Osborne’s or Gosnell’s behavior.

13                   **Santana’s Sexual Degradation of Plaintiff Rivals That of Humiston’s**

14          44. Similar to her experiences with Humiston and Gosnell, Plaintiff became a  
15          frequent target of Santana—a Vice President within APA’s Talent Department. For the  
16          majority of Plaintiff’s employment at APA, she sat diagonally outside of Santana’s office  
17          such that he always had a view of her from his office. As such, Santana would routinely  
18          make wildly inappropriate and sexually demeaning comments toward Plaintiff on a near  
19          daily basis, including comments such as: “Your booty looks so hot today”, and “you make  
20          me so hard” and “if I take you on a vacation, I could finally live out my fantasies with you”,  
21          and “does it pleasure you to know how hard you make me”, and “what color lingerie are you  
22          wearing”, and “do the curtains match the drapes”, and “you make me so fucking horny”, and  
23          “you have no idea about the thoughts that are running through my head while I’m thinking  
24          about you—you make me so horny sitting right across from me”.

25          45. Additionally, Santana would incessantly text Plaintiff sexually inappropriate  
26          and unwanted remarks, including the following messages in quotes below:

- 27                   a. “[Plaintiff’s name] you make me so horny. Right across from me all day all the  
28                   thoughts running through my head.”

- b. "If I take you on a weekend getaway I could finally live out these fantasies I have for you"
- c. When Plaintiff texted "PAUL STOP!" I want you to stop NOW. You're married and this is not wanted," Mr. Santana's response was:
- d. "Those are just logistics sexy [...] [L]et me deal with the wife" and
- e. "[Plaintiff's name] come on your ass looks so hot in those jeans" and
- f. "Do you know how hard I am right now? All for you."

True and correct copies of these referenced and partially redacted text messages from Santana to Plaintiff are attached hereto as "**Exhibit 2**".

**Plaintiff Regularly Reports The Inappropriate Sexual Conduct and Abuse That She Endures at APA to Gosnell and J. Johnson**

46. During her entire tenure at APA, Plaintiff repeatedly reported the sexual abuse and harassment at the hands of APA's executives to its CEO—Gosnell and APA's head of Human Resources—J. Johnson. Neither did anything to stop the abusive behavior. Rather, Gosnell told Plaintiff that she just had to "put up with it", that "boys will be boys" and that if she "couldn't handle it", then she "wasn't cut out for Agency life". That is, if Plaintiff wanted to keep her job at APA, she was expected to tolerate the constant stream of sexual torment and abuse that she was routinely subjected to.

**APA Puts Plaintiff In Harm's Way So That A Key Client—Defendant Hammond—Can Sexually Assault Her**

47. Ultimately, the egregious sexual conduct promoted and condoned by APA, and its toxic culture, culminated in Plaintiff's sexual assault by one of APA's clients. In July 2017, Plaintiff was compelled by APA to attend a meeting with Hammond—one of APA's top clients—in Hammond's office at Collins Avenue Productions. With the door closed to his office, and under the guise of giving Plaintiff "a hug", Hammond thrust himself onto Plaintiff with an erect penis, forcibly kissing her mouth while placing his hands on her hips and then sliding them up her chest and grabbing her breasts. Plaintiff was terrified and shaking during the encounter and was able to escape when there was a knock at Hammond's

1 office door by his secretary, prompting Plaintiff to immediately leave Hammond's office and  
2 return to APA.

3 48. Plaintiff immediately reported Hammond's sexual attack to Gosnell, J.  
4 Johnson, Osborne and APA Partner Hayden Meyer ("Meyer"). Both Gosnell and Meyer  
5 warned Plaintiff that if she reported the sexual assault to the police, she would be  
6 immediately fired. When Gosnell informed APA's General Counsel—Julia Johnson—about  
7 Hammond's attack on Plaintiff, Julia Johnson verbally told Plaintiff that she needed to "zip  
8 her lips" because "Collins Avenue is a very important client to APA". Thereafter, Plaintiff  
9 was forced by Meyer to continue working with Hammond.

10 49. Regrettably, Hammond's harassment of Plaintiff continued. Less than two  
11 months after the sexual assault on Plaintiff, Hammond sent Plaintiff text messages such as  
12 "I'm in your hood, I want to take you out for a drink", and "we are going to take over the  
13 world together sexy" and "I know you want me."

14 50. In October 2017, a scandal erupted at APA when one of its former top Talent  
15 Agents was alleged to have sexually assaulted multiple minor boys. As a result, APA came  
16 under intense scrutiny. Accordingly, in November 2017, APA finally retained a "third-party  
17 investigator" to investigate Plaintiff's complaints against Santana (and later, Humiston).

18 51. In December 2017, and before the investigator and lawyer hired by  
19 APA—Mattias Wagener ("Wagener")—was initially scheduled to interview Plaintiff,  
20 Gosnell ordered Plaintiff to have "memory loss" about Santana's egregious conduct toward  
21 her over the years. In order to "encourage" Plaintiff's "memory loss", Gosnell withheld  
22 Plaintiff's holiday bonus check, which had been regularly issued to her since she began her  
23 employment at APA. In January 2018, Gosnell also rescinded Plaintiff's written employment  
24 offer that had recently been extended to Plaintiff (yet backdated to September 2017) in  
25 consideration of Plaintiff landing a big-named talent at APA earlier in September 2017.

26 52. Plaintiff eventually conducted her "interview" with Wagener on or about  
27 February 6, 2018, with regard to her complaints about Santana's repeated sexual harassment  
28 of her. But shockingly, when Plaintiff raised the fact that Humiston had also sexually

1 harassed her, Wagener shut the conversation down and told Plaintiff that he did not care to  
2 hear anything about Humiston's alleged sexual harassment of her. In fact, Wagener told  
3 Plaintiff that any complaints about Humiston's sexual harassment of Plaintiff were "outside  
4 [his] scope" and that APA did not want to conduct an investigation into Humiston.

5 53. After Plaintiff's initial "interview" on February 6, 2018, she was immediately  
6 retaliated against by APA and ostracized as nearly everyone at APA stopped interacting with  
7 her. As part of Plaintiff's isolation at APA, she was left out of meetings and calls with clients  
8 and stopped receiving valuable assistance with her projects. In addition, Plaintiff began  
9 working from home around this time, and continued to do so up until her termination in  
10 August 2018. That is, Plaintiff was not only psychologically isolated at APA, but also  
11 physically isolated in that she rarely came into APA's offices after the investigations began.

12 54. Subsequent to Mr. Wagener's "interview" of her in February 2018, Plaintiff  
13 conducted a separate "interview" with another investigator hired by APA—Julie Yannow  
14 ("Yannow")—on March 8, 2018—in which Yannow and Plaintiff discussed Humiston's  
15 sexual harassment of Plaintiff.

16 55. Plaintiff was never publicly informed of the outcome or findings of either one  
17 of APA's investigations into Santana or Humiston.

18 **Seven Months After The Initial "Investigation" Into the Sexual Harassment**  
19 **Allegations Against Santana and Humiston, APA Retaliated Against Plaintiff By**  
20 **Terminating Her Employment**

21 56. In late August 2018, APA terminated Plaintiff's employment. Specifically, the  
22 co-Head of Human Resources—Michael Conway<sup>5</sup> ("Conway")—sent Plaintiff an email  
23 declaring that she was being let go from her employment at APA for reasons that had no  
24 merit in law or in fact and were entirely pretextual in nature. Plaintiff never had an  
25 opportunity to either meet in person with anyone at APA to discuss to her termination, or to  
26 even have a phone conversation with anyone at APA to discuss her termination.

27 <sup>5</sup> Conway had been hired by APA as a co-Head of HR in October 2017 to assist J. Johnson  
28 with her duties when an underage sexual abuse scandal involving one of APA's top Talent  
Agents surfaced and brought with it immense public scrutiny, critique and media attention.

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**California Civil Code § 51.9**

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1           60. Defendant APA was in a business, service, or professional relationship with  
2 Plaintiff in which Plaintiff was unable to easily terminate the relationship due to her  
3 contractual obligations to Defendant APA.

4           61. As detailed above, Defendant APA's agents, employees, and representatives,  
5 including Santana and Humiston, made sexual advances, solicitation, sexual requests,  
6 demands for sexual compliance by Plaintiff, and engaged in other verbal, visual, and  
7 physical conduct of a sexual and hostile nature based on gender that were unwelcome by  
8 Plaintiff and pervasive and severe.

9           62. Defendant APA's representatives, including Santana and Humiston, engaged in  
10 such sexual harassment with the intent to cause unwanted, harmful and offensive contact to  
11 Plaintiff. As described above, Defendant APA's representatives engaged in inappropriate  
12 conduct and created a hostile work environment for Plaintiff by sending her inappropriate  
13 text messages, by physically intimidating her with the intent to engage in sexual relations,  
14 and by creating a sexually hostile work environment.

15           63. Defendant APA ratified its agents, servants, employees, and authorized  
16 representatives' unlawful conduct and behavior as described herein by: (1) allowing a  
17 sexually abusive culture to exist in its Beverly Hills office; (2) continuing to pay its agents,  
18 servants, employees, and authorized representatives despite knowledge of the unlawful  
19 conduct described herein; and (3) failing to report the unlawful conduct of any of its agents,  
20 servants, employees, and/or authorized representatives at any point to any authorities within  
21 or outside of APA.

22           64. As a direct and proximate cause of the tortious, unlawful, and wrongful acts of  
23 Defendant APA and its respective agents, servants, employees, and authorized  
24 representatives as aforesaid, Plaintiff has suffered past and future special damages and past  
25 and future general damages in an amount according to proof at trial. Plaintiff has been  
26 damaged emotionally and financially, including but not limited to emotional suffering from  
27 emotional distress and ridicule, as well as loss of income, employment, and career benefits.  
28



1           65. In engaging in the conduct as hereinabove alleged, Defendant APA and its  
2 agents, servants, employees, and authorized representatives acted with malice, fraud, and  
3 oppression and/or in conscious disregard to Plaintiff's health, rights, and well-being, and  
4 intended to subject Plaintiff to unjust hardship, thereby warranting an assessment of punitive  
5 damages in an amount sufficient to punish Defendants and deter others from engaging in  
6 similar conduct. Plaintiff is entitled to an award of attorney's fees against Defendants  
7 pursuant to California Civil Code section 52.

8                                   **SECOND CAUSE OF ACTION**

9                                   **GENDER VIOLENCE**

10                                  **California Civil Code § 52.4**

11                                  *(By Plaintiff against Defendants APA, Gosnell, Humiston, Santana, and Does 1-50)*

12           66. Plaintiff incorporates by reference each and every allegation set forth in the  
13 preceding paragraphs as though fully set forth herein.

14           67. California Civil Code section 52.4 states that gender violence is a "form of sex  
15 discrimination" and means any of the following:

16                                  (1) One of more acts that would constitute a criminal offense under state  
17 law that has an element the use, attempted use, or threatened use of physical  
18 force against the person or property of another, committed at least in part  
19 based on the gender of the victim, whether or not those acts have resulted in  
20 criminal complaints, charges, prosecution, or conviction.

21                                  (2) A physical intrusion or physical invasion of a sexual nature under  
22 coercive conditions, whether or not those acts have resulted in criminal  
23 complaints, charges, prosecution, or conviction.

24           68. Defendants wrongfully deprived Plaintiff of her right to be free from any use  
25 of physical force, violence, or intimidation by threat of violence or use of physical force,  
26 committed against her person because of her sex and/or gender in violation of California  
27 Civil Code section 52.4. Plaintiff is informed and believes, and thereon alleges, that  
28

1 Plaintiff's gender was a motivating factor in Defendants' unlawful treatment of her,  
2 committed at least in part based on Plaintiff's gender.

3 69. Defendant APA ratified its agents, servants, employees, and authorized  
4 representatives' unlawful conduct and behavior was described herein by: (1) allowing a  
5 sexually abusive culture to exist in its Beverly Hills office; (2) continuing to pay its agents,  
6 servants, employees, and authorized representatives despite knowledge of the unlawful  
7 conduct described herein; and (3) failing to report the unlawful conduct of any of its agents,  
8 servants, employees, and/or authorized representatives at any point to any authorities within  
9 or outside of APA.

10 70. As a direct and proximate cause of the tortious, unlawful, and wrongful acts of  
11 Defendant APA and its respective agents, servants, employees, and authorized  
12 representatives as aforesaid, as well as those acts of Hammond as herein alleged, Plaintiff  
13 has suffered past and future special damages and past and future general damages in an  
14 amount according to proof at trial. Plaintiff has been damaged emotionally and financially,  
15 including but not limited to emotional suffering from emotional distress and ridicule, as well  
16 as loss of income, employment, and career benefits.

17 71. In engaging in the conduct as hereinabove alleged, Defendant APA and its  
18 agents, servants, employees, and authorized representatives, acted with malice, fraud, and  
19 oppression and/or in conscious disregard to Plaintiff's health, rights, and well-being, and  
20 intended to subject Plaintiff to unjust hardship, thereby warranting an assessment of punitive  
21 damages in an amount sufficient to punish Defendants and deter others from engaging in  
22 similar conduct.

23 72. Plaintiff is entitled to an award of statutory fees and attorneys' fees against  
24 Defendants pursuant to California Civil Code section 52.4(a).

25 ///

26 ///

27 ///

28 ///

1 **THIRD CAUSE OF ACTION**

2 **CIVIL HARRASMENT**

3 **California Code of Civil Procedure § 527.6**

4 *(By Plaintiff against Defendants APA, Gosnell, Humiston, Santana, and Does 1-50)*

5 73. Plaintiff incorporates by reference each and every allegation set forth in the  
6 preceding paragraphs as though fully set forth herein.

7 74. Defendants' conduct, as described above, was "a knowing and willful course  
8 of conduct directed at a specific person that seriously alarms, annoys, or harasses the person  
9 and that serves no legitimate purpose," thus constituting civil harassment under California  
10 Code of Civil Procedure section 527.6(b).

11 75. Defendants' "course of conduct [was] such as would cause a reasonable person  
12 to suffer substantial emotional distress, and [did] actually cause substantial emotional  
13 distress to the plaintiff," as required by California Code of Civil Procedure.

14 76. Defendant APA ratified its agents, servants, employees, and authorized  
15 representatives' unlawful conduct and behavior was described herein by: (1) allowing a  
16 sexually abusive culture to exist in its Beverly Hills office; (2) continuing to pay its agents,  
17 servants, employees, and authorized representatives despite knowledge of the unlawful  
18 conduct described herein; and (3) failing to report the unlawful conduct of any of its agents,  
19 servants, employees, and/or authorized representatives at any point to any authorities within  
20 or outside of APA.

21 77. Plaintiff suffered severe emotional distress, including experiencing bouts of  
22 anxiety, depression and crying repeatedly at work, while also feeling guilty, ashamed,  
23 embarrassed, diminutive, powerless and helpless. Defendant APA, including its agents,  
24 servants, employees, and authorized representatives, was a substantial factor in causing  
25 Plaintiff's severe emotional distress.

26 78. As a direct and proximate cause of the tortious, unlawful, and wrongful acts of  
27 Defendant APA and its respective agents, servants, employees, and authorized  
28 representatives as aforesaid, Plaintiff has suffered past and future special damages and past

1 and future general damages in an amount according to proof at trial. Plaintiff has been  
2 damaged emotionally and financially, including but not limited to emotional suffering from  
3 emotional distress and ridicule, as well as loss of income, employment, and career benefits.

4 79. In engaging in the conduct as hereinabove alleged, Defendant APA and its  
5 agents, servants, employees, and authorized representatives, acted with malice, fraud, and  
6 oppression and/or in conscious disregard to Plaintiff's health, rights, and well-being, and  
7 intended to subject Plaintiff to unjust hardship, thereby warranting an assessment of punitive  
8 damages in an amount sufficient to punish Defendants and deter others from engaging in  
9 similar conduct.

#### 10 FOURTH CAUSE OF ACTION

#### 11 INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

12 *(By Plaintiff against Defendants APA, Gosnell, Humiston, Santana, Hammond, and Does 1-50)*

13 80. Plaintiff incorporates by reference each and every allegation set forth in the  
14 preceding paragraphs as though fully set forth herein.

15 81. Defendants' conduct as described above, was extreme and outrageous and  
16 beyond the bounds of decency tolerated in a civilized society.

17 82. Defendants' conduct was intended to cause Plaintiff emotional distress and  
18 Defendants acted with a reckless disregard to the probability that Plaintiff would suffer  
19 emotional distress, which Plaintiff did in fact suffer, including experiencing bouts of anxiety,  
20 depression and crying repeatedly at work, while also feeling guilty, ashamed, embarrassed,  
21 diminutive, powerless and helpless.

22 83. Defendant APA ratified its agents, servants, employees, and authorized  
23 representatives' unlawful conduct and behavior was described herein by: (1) allowing a  
24 sexually abusive culture to exist in its Beverly Hills office; (2) continuing to pay its agents,  
25 servants, employees, and authorized representatives despite knowledge of the unlawful  
26 conduct described herein; and (3) failing to report the unlawful conduct of any of its agents,  
27 servants, employees, and/or authorized representatives at any point to any authorities within  
28 or outside of APA.

### FIFTH CAUSE OF ACTION

## NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

*(By Plaintiff against Defendants APA, Gosnell, Humiston, Santana, Hammond, and Does 1-50)*

87. Plaintiff incorporates by reference each and every allegation set forth in the preceding paragraphs as though fully set forth herein.

1 abused, harassed, and insulted Plaintiff, and Defendant APA was aware of such conduct by  
2 its agents, employees, and representatives and allowed it to continue.

3 90. Defendant APA ratified its agents, servants, employees, and authorized  
4 representatives' unlawful conduct and behavior was described herein by: (1) allowing a  
5 sexually abusive culture to exist in its Beverly Hills office; (2) continuing to pay its agents,  
6 servants, employees, and authorized representatives despite knowledge of the unlawful  
7 conduct described herein; and (3) failing to report the unlawful conduct of any of its agents,  
8 servants, employees, and/or authorized representatives at any point to any authorities within  
9 or outside of APA.

10 91. Plaintiff suffered severe emotional distress and Defendants were a substantial  
11 factor in causing Plaintiff's severe emotional distress.

12 92. As a direct and proximate cause of the tortious, unlawful, and wrongful acts of  
13 Defendant APA and its respective agents, servants, employees, and authorized  
14 representatives as aforesaid, and separately as for Hammond, Plaintiff has suffered past and  
15 future special damages and past and future general damages in an amount according to proof  
16 at trial. Plaintiff has been damaged emotionally and financially, including but not limited to,  
17 emotional suffering from emotional distress and ridicule, as well as loss of income,  
18 employment, and career benefits.

19 93. In engaging in the conduct as hereinabove alleged, Defendant APA and its  
20 agents, servants, employees, and authorized representatives, and separately as for Hammond,  
21 acted with malice, fraud, and oppression and/or in conscious disregard to Plaintiff's health,  
22 rights, and well-being, and intended to subject Plaintiff to unjust hardship, thereby  
23 warranting an assessment of punitive damages in an amount sufficient to punish Defendants  
24 and deter others from engaging in similar conduct.

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1 SIXTH CAUSE OF ACTION

2 **NEGLIGENT RETENTION AND SUPERVISION**

3 *(By Plaintiff against Defendants APA and Does 1-50)*

4 94. Plaintiff incorporates by reference each and every allegation set forth in the  
5 preceding paragraphs as though fully set forth herein.

6 95. Defendant APA has a duty to retain employees who are fit and competent, to  
7 supervise its employees, and to implement measures to protect third persons from the  
8 predictable and foreseeable risks posed by its employees.

9 96. Defendant APA knew, or in the exercise of reasonable diligence, should have  
10 known, that Plaintiff's superiors and colleagues, and in particular Santana and Humiston, as  
11 herein alleged, were incompetent and unfit to perform the duties for which they were  
12 employed, and that undue risks to persons such as Plaintiff would result by way of their  
13 inappropriate conduct. The conduct of Plaintiff's supervisors occurred in their capacity as  
14 employees of Defendant APA, and was done for the benefit of Defendant APA.

15 97. Defendant APA was negligent by breaching the duty of care by retaining and  
16 failing to supervise Plaintiff's supervisors and colleagues, all of whom had known  
17 propensities for unlawful behavior including abuse, harassment, and misconduct towards  
18 females with whom they worked. The conduct towards Plaintiff was foreseeable based on  
19 Defendant APA's male employees' treatment towards other female employees. Defendant  
20 APA had knowledge of such conduct. Defendant APA breached its duty of care by failing to  
21 implement measures to protect third persons from foreseeable risks, unreasonable risks of  
22 harm, and the recurrence of employee behavior of which it had prior notice. Instead,  
23 Defendant APA failed to terminate the above-named employees or take any disciplinary  
24 actions against them whatsoever and retained them and allowed them to continue victimizing  
25 Plaintiff so that it may continue to reap the financial rewards of their conduct.

26 98. Defendant APA's failure to train, supervise, terminate, or otherwise reprimand  
27 the above-mentioned employees was the direct and proximate cause of Plaintiff's injuries.  
28

1 Plaintiff has suffered past and future special damages and past and future general damages in  
2 an amount according to proof at trial.

3 99. Plaintiff has been damaged physically, emotionally, and financially, including,  
4 but not limited to suffering from pain, anxiety, depression, emotional distress, ridicule, as  
5 well as loss of health, income, employment, and career benefits.

6 **SEVENTH CAUSE OF ACTION**

7 **RETALIATION**

8 *(By Plaintiff against Defendant APA and Does 1-50)*

9 100. Plaintiff incorporates by reference each and every allegation set forth in the  
10 preceding paragraphs as though fully set forth herein.

11 101. Plaintiff opposed the sexual harassment, discrimination, and other offensive  
12 conduct as described herein by reporting the conduct, and demanding that it be stopped.

13 102. APA failed to address Plaintiff's complaints in any meaningful or satisfactory  
14 manner, and frequently callously dismissing or trivializing Plaintiff's complaints. Further,  
15 APA reluctantly initiated an "investigation" into Plaintiff's complaints, but nearly three (3)  
16 years *after* Plaintiff initially reported the sexual harassment and only after an unrelated  
17 matter prompted APA to take Plaintiff's complaints more seriously.

18 103. The acts and/or omissions of APA materially and adversely affected the terms  
19 and conditions of Plaintiff's employment, including: delaying and/or preventing Plaintiff  
20 from earning more money at APA, delaying and/or preventing her from advancing in her  
21 career, and ultimately, culminating in her termination at APA.

22 104. Plaintiff opposed the sexual harassment, discrimination, and other offensive  
23 conduct as described herein and reporting it was a motivating reason for her termination in  
24 violation of Government Code Section 12940 (h) and for the continued harassment.

25 105. Defendant APA ratified its agents, servants, employees, and authorized  
26 representatives' unlawful conduct and behavior was described herein by: (1) allowing a  
27 sexually abusive culture to exist in its Beverly Hills office; (2) continuing to pay its agents,  
28 servants, employees, and authorized representatives despite knowledge of the unlawful

1 conduct described herein; and (3) failing to report the unlawful conduct of any of its agents,  
2 servants, employees, and/or authorized representatives at any point to any authorities within  
3 or outside of APA.

4 106. The acts and/or omissions of Defendant APA caused Plaintiff to suffer harm  
5 and economic damages for loss of past and future earning and employee benefits, loss of  
6 earning capacity, loss of such employment related opportunities as the opportunity for  
7 advancement and promotion within Defendant APA, in amounts according to proof at trial.

8 107. In engaging in the conduct as hereinabove alleged, Defendant APA and its  
9 agents, servants, employees, and authorized representatives acted with malice, fraud, and  
10 oppression and/or in conscious disregard to Plaintiff's health, rights, and well-being, and  
11 intended to subject Plaintiff to unjust hardship, thereby warranting an assessment of punitive  
12 damages in an amount sufficient to punish Defendant APA and deter others from engaging in  
13 similar conduct.

14 **EIGHTH CAUSE OF ACTION**

15 **WRONGFUL TERMINATION**

16 *(By Plaintiff against Defendant APA and Does 1-50)*

17 108. Plaintiff incorporates by reference each and every allegation set forth in the  
18 preceding paragraphs as though fully set forth herein.

19 109. Plaintiff was required to endure sexual harassment, discrimination, and other  
20 offensive conduct described herein during her employment with Defendant APA.

21 110. Defendant APA terminated Plaintiff's employment on or around August 2018  
22 based on pretextual grounds.

23 111. Plaintiff's gender and opposition to the sexual harassment, discrimination, and  
24 other offensive conduct described herein were motivating reasons for her termination.

25 112. Defendant APA was aware, or should have been aware, of the likelihood that  
26 Plaintiff would suffer severe emotional distress as a result of the above-described outrageous  
27 conduct. The outrageous and shocking conduct of Defendant APA and its employees, as  
28

1 herein alleged, was done intentionally and for the purpose of inflicting extreme and severe  
2 emotional distress upon Plaintiff.

3 113. Defendant APA knowingly created and intentionally permitted these  
4 intolerable working conditions and failed to take appropriate remedial steps to protect  
5 Plaintiff from discrimination as well as the infliction of the extreme and severe emotional  
6 distress upon Plaintiff.

7 114. Plaintiff was harmed and the requirement that she endures sexual harassment,  
8 discrimination, and other offensive conduct as described herein during the course of her  
9 employment was a substantial factor causing Plaintiff's harm.

10 115. Further, Plaintiff was harmed in that she was terminated without notice,  
11 warning, or an opportunity to explain the so-called justification for her termination, all in  
12 violation of and inconsistent with Defendant APA's own internal procedures and practices.

13 116. Plaintiff's termination from her employment was rooted in violation of public  
14 policy embodied in California's Fair Employment and Housing Act (FEHA), California  
15 Government Code § 12940, et seq., California Constitution Art. I, Section 8, and case law.

16 117. As a direct and proximate cause of the tortious, unlawful, and wrongful acts of  
17 Defendant APA and its respective agents, servants, employees, and authorized  
18 representatives as aforesaid, Plaintiff has suffered past and future special damages and past  
19 and future general damages in an amount according to proof at trial. Plaintiff has been  
20 damaged emotionally and financially, including but not limited to emotional suffering from  
21 emotional distress and ridicule, as well as loss of income, employment, and career benefits.

22 118. In engaging in the conduct as hereinabove alleged, Defendant APA and its  
23 agents, servants, employees, and authorized representatives acted with malice, fraud, and  
24 oppression and/or in conscious disregard to Plaintiff's health, rights, and well-being, and  
25 intended to subject Plaintiff to unjust hardship, thereby warranting an assessment of punitive  
26 damages in an amount sufficient to punish Defendants and deter others from engaging in  
27 similar conduct.

28 ///

1 **NINTH CAUSE OF ACTION**

2 **SEXUAL BATTERY**

3 ***(Plaintiff against Defendant Michael Hammond)***

4 119. Plaintiff incorporates by reference each and every allegation set forth in the  
5 preceding paragraphs as though fully set forth herein.

6 120. Defendant Hammond engaged in sexual battery with the intent to cause  
7 harmful and offensive contact with Plaintiff's intimate body parts. Hammond's act directly  
8 resulted in sexually offensive contact. As described herein, Hammond thrust himself onto  
9 Plaintiff with an erect penis, forcibly kissing her while reaching his hand around her waist  
10 and squeezing her breasts.

11 121. As a direct and proximate cause of the tortious, unlawful, and wrongful acts of  
12 Hammond, Plaintiff suffered past and future special damages and past and future general  
13 damages in an amount according to proof at trial. Plaintiff has been damaged emotionally  
14 and financially, including but not limited to emotional suffering from emotional distress and  
15 ridicule, as well as loss of income, employment, and career benefits.

16 122. The unlawful acts and practices of Defendant were reckless and willful and  
17 cause great harm to Plaintiff. Given such intentional, vexatious, oppressive, despicable, and  
18 malicious conduct, and the conscious disregard of Plaintiff's rights and well-being, Plaintiff  
19 is entitled to recover exemplary damages sufficient to punish Defendant and to serve as an  
20 example to deter Defendant from similar conduct in the future.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, Plaintiff respectfully requests for judgment to be entered upon  
23 Defendants APA, Jim Gosnell, Josh Humiston, Paul Santana, Michael Hammond, and DOES  
24 1 through 50, inclusive, as follows:

25 1. For general damages, according to proof, on each cause of action for which  
26 such damages are available;

27 2. For special damages according to proof, on each cause of action for which such  
28 damages are available;

1           3.     For compensatory damages, according to proof, on each cause of action for  
2 which such damages are available;

3           4.     For punitive damages, according to proof, on each cause of action for which  
4 such damages are available;

5           5.     For pre-judgment and post-judgment interest according to law;

6           6.     For reasonable attorneys' fees incurred in this action on those causes of action  
7 for which such fees are recoverable under the law;

8           7.     For costs of suit incurred in this action; and

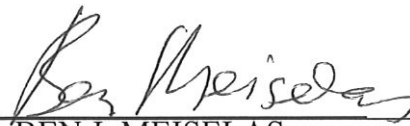
9           8.     For such other and further relief as the Court may deem proper and just.

10  
11                                   **DEMAND FOR JURY TRIAL**


12           Plaintiff hereby demands a jury trial on all causes of action.

13  
14           DATED: June 18, 2019

**GERAGOS & GERAGOS, APC**

15  
16                                   By:   
17                                   BEN J. MEISELAS  
18                                   MATTHEW M. HOESLY  
19                                   MATTHEW VALLEJO  
20                                   Attorneys for Plaintiff,  
21                                   JANE DOE

22                                   **ZUMPAÑO PATRICIOS &  
23                                   POPOK PLLC**

24                                   By:   
25                                   MICHAEL S. POPOK  
26                                   Attorneys for Plaintiff,  
27                                   JANE DOE  
28                                   (Pro Hac Vice Motion Pending)



# Exhibit 1

●●●●● Verizon

3:35 PM



Messages [redacted]

Details

Text Message  
Mar 22, 2017, 5:19 PM

Your body is so hot I've  
never seen it in a bikini  
you should come over to  
my pool

If you fuck me I'll  
convince Jim to pay you  
more money

You're a fucking cunt  
you must suck black  
cocks like [redacted] to  
sign clients

I'm going to get you fired  
bitch I know you suck  
pussy and cock like [redacted]



Text Message [redacted]

Send

---

# **Exhibit 2**

██████ you make me so  
horny. Right across from  
me all day all the  
thoughts running  
through my head.

If I take you on a  
weekend getaway I  
could finally live out  
these fantasies I have for  
you

PAUL STOP! I want you  
to stop NOW. You're  
married and this is not  
wanted.

Those are just logistics  
sexy let me deal with the  
wife.

██████ come on your ass



Text Message

Send

could finally live out  
these fantasies I have for  
you

PAUL STOP! I want you  
to stop NOW. You're  
married and this is not  
wanted.

Those are just logistics  
sexy let me deal with the  
wife.

come on your ass  
looks so hot in those  
jeans

Do you know how hard I  
am right now? All for

**VERIFICATION**

FORM No. 2

**Verification of Pleading (Code Civ. Proc., § 446)  
Declaration under Penalty of Perjury Form (Code Civ. Proc., §§ 446, 2015.5)**

by Party

CASE TITLE JANE DOE v. AGENCY FOR THE PERFORMING ARTS, INC. et. al.

I, Jane Doe, declare:  
(Name)

I am the Plaintiff in the above-entitled matter.

I have read the foregoing  
(pleading, e.g., complaint) and know the contents thereof.

The same is true of my own knowledge, except as to those matters which are  
therein stated on information and belief, and, as to those matters, I believe it to be true.

Executed on June 18, 2019, at Los Angeles  
County, California.

I declare (or certify) under penalty of perjury that the foregoing is true and correct.

Jane Doe  
(Signature of Party)